

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA**

Freddie Steve Gray :  
Plaintiff, :  
vs. : Civil Action No. 23-CV-143-TFM-MU  
:   
Huntsman Advanced Materials ET AL :  
Defendant(s) : Jury Trial Demanded

FILED APR 24 23 PM 11:12 USDC ALB

**COMPLAINT**

1. Plaintiff resides at 827 Church and Gray Rd Vinegar Bend, AL 36384
2. Name(s) of defendant(s) Huntsman Advanced Materials Americas LLC.  
Worley Field Services, Inc.
3. Location of principal office(s) of the named defendant(s) 10003 Woodloch  
Forest Dr The Woodlands, TX 77380  
5995 Regendale Rd Houston TX 77072
4. Nature of business of defendant(s) Chemical Manufacturing  
Chemical Energy and Resource division
5. Approximate number of individuals employed by defendant(s) 500+
6. The acts complained of in this suit concern:
  - (A) \_\_\_\_ Failure to employ me.
  - (B) \_\_\_\_ Termination of my employment.
  - (C) \_\_\_\_ Failure to promote me.
  - (D) X Other acts as specified below: Race and Retaliation

7. Plaintiff is:

- (A) ☒ Presently employed by the defendant.  
(B) ☐ Not presently employed by the defendant.

The dates of employment were \_\_\_\_\_

- (1) ☐ Plaintiff was discharged.  
(2) ☐ Plaintiff was laid off.  
(3) ☐ Plaintiff left the job voluntarily.

8. Defendant(s) discriminated against me on account of my:

- (A) ☒ Race \_\_\_\_\_ Sex \_\_\_\_\_  
\_\_\_\_\_ Color \_\_\_\_\_ National Origin \_\_\_\_\_  
\_\_\_\_\_ Religion \_\_\_\_\_

Therefore, I am bringing this action for employment discrimination pursuant to Title VII of the Civil Rights Act of 1964, specifically, 42 U.S.C. § 2000e-5.

- (B) ☐ Physical disability  
\_\_\_\_\_ Mental disability

Therefore, I am bringing this action pursuant to the American with Disabilities Act, specifically, 42 U.S.C. § 12117.

- (C) ☐ Age

Therefore, I am bringing this action pursuant to the Age Discrimination in Employment Act of 1967, specifically, 29 U.S.C. § 626.

9. The name(s), race, sex, and the position or title of the individual(s) who allegedly

discriminated against me during the period of my employment with the defendant company is  
(are) Jane Kelly (w, F) Mark Smith (w, M) Mike Barnett (w, M)  
Huntsman HR Manager Huntsman EHS Manager Worley Cite Manager

10. The alleged discrimination occurred on or about 11-01-21

11. The nature of my complaint, i.e., the manner in which the individual(s) named above

discriminated against me in terms of the conditions of my employment, is as follows: I, I  
complained about race discrimination within their hiring practice.  
On May 27, 2021 I was called into a meeting with Mark Smit and  
Huntsman HR Manager, Jane Kelly. They accused me of spreading rumors about  
race discrimination. They aggressively questioned me. II, I was  
retaliated against because of my complaints of race discrimination.  
On Nov 1, 2021, Mr. Mike Barnett (Woolley City Manager) informed me that Huntsman  
told him that he must terminate or demote me. He said he must follow  
Huntsman directive. I accepted the demotion of a lower paying job.  
12. The alleged illegal activity took place at \_\_\_\_\_

Huntsman, McIntosh, AL

13. I filed charges with the Equal Employment Opportunity Commission regarding alleged discriminatory conduct by defendant(s) on or about 12/29/2021

I have attached a copy of the Notice-of-Right-to-Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on 1/25/2023

14. I seek the following relief:

(A) ☒ Recovery of back pay.

(B) ☒ Reinstatement to my former job, and any other relief as may be appropriate,

including injunctive orders, damages, costs and attorney's fees.

Date: 4-24-2023

Freddie Steve Gray  
Signature of Plaintiff

Freddie Steve Gray  
827 Church and Gray Rd  
Vinegar Bend, Ala 36584  
Address of Plaintiff

(251) 242-1589  
Telephone Number of Plaintiff